

1 Michael C. Ormsby
2 United States Attorney
3 Eastern District of Washington
4 Tyler H.L. Tornabene
5 Assistant United States Attorney
Post Office Box 1494
Spokane, WA 99210-1494
Telephone: (509) 353-2767

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

SEP 28 2011

JAMES R. LARSEN, CLERK
DEPUTY
SPOKANE, WASHINGTON

6
7 UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

8 UNITED STATES OF AMERICA, }
9 Plaintiff, }
10 vs. }
11 CARL SCHROEDER, }
12 Defendant. }
13 }
14)

CR-11-6067-LRS

INFORMATION

Vio: 18 U.S.C. § 286
Conspiracy to Defraud the
Government with Respect to
Claims (Count 1)

15 The United States Attorney Charges:

16 Count 1:

17 That from on or about May 24, 2004 until on or about December 16, 2008 in
18 the Eastern District of Washington and elsewhere, the Defendant, CARL
19 SCHROEDER, and other persons both known and unknown, knowingly and
20 willfully entered into an agreement, combination, and conspiracy with each other
21 to defraud the United States Department of Energy, by obtaining and aiding to
22 obtain the payment and allowance of false, fictitious, and fraudulent claims in the
23 manner and means as follows:

24 It was part of the agreement, combination, and conspiracy that the
25 Defendant, CARL SCHROEDER and other persons, both known and unknown,
26 would falsely claim to have worked certain amounts of hours for CH2M Hill
27 Hanford Group Inc., ("CH2M Hill") allocable to the prime contract between
28 CH2M Hill and the United States Department of Energy; contract number DE-
Information - 1

1 AC27-99RL14047 ("the prime contract"). It was further a part of the agreement,
2 combination, and conspiracy that the Defendant, CARL SCHROEDER, and other
3 persons, both known and unknown, would falsely claim to have worked eight
4 hours of overtime allocable to the prime contract when in truth and in fact the
5 Defendant, CARL SCHROEDER, and persons both known and unknown, had not
6 worked eight hours of overtime.

7 It was further part of the agreement, combination, and conspiracy that the
8 Defendant, CARL SCHROEDER, and other persons, both known and unknown,
9 would take actions designed to avoid detection of the agreement, combination, and
10 conspiracy, by law enforcement, to wit: on or about May of 2008 a direct
11 supervisor of the Defendant, CARL SCHROEDER, (herein "the supervisor")
12 received an anonymous text reading "You are requested to have all you Base Ops
13 HPT's working overtime this evening to return back to work or face disciplinary
14 actions," the supervisor verified that in fact employees were not on site; the
15 supervisor contacted multiple employees and directed them, contrary to the normal
16 practice of the agreement, combination, and conspiracy, to claim hours they
17 actually worked; the supervisor did not formally discipline any employees; the
18 supervisor later knowingly approved false claims made by employees, including
19 false claims by the Defendant, CARL SCHROEDER, subsequent to May of 2008,
20 claiming payment for hours not worked.

21 Under the prime contract the fully burdened cost of labor allocable to the
22 prime contract was borne by the United States Department of Energy. In this
23 manner the United States Department of Energy bore the full loss caused by the
24 //

25 //

26 //

27 //

28 //

1 false, fictitious, and fraudulent claims of the Defendant, CARL SCHROEDER.
2

3 All in violation of Title 18, United States Code, Section 286.

4
5 DATED this 28th day of September, 2011.
6

7 Michael C. Ormsby
8 United States Attorney



9
10 Tyler H.L. Tornabene
Assistant United States Attorney